

FILED**9/26/2016**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISIONSean Hanks M48627**RECEIVED**

AUG 29 2016 AB

(Enter above the full name
of the plaintiff or plaintiffs in
this action)THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

vs.

Thomas J. DartCase No: 16 C 6890(To be supplied by the Clerk of this Court)Director Daniel MoreciDirector JonesOfficer John DoeSergeant Jones(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")**CHECK ONE ONLY:**Amended Complaint**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983**
U.S. Code (state, county, or municipal defendants)**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE**
28 SECTION 1331 U.S. Code (federal defendants)**OTHER** (cite statute, if known)**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR**
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

A. Name: Sean Hanks

B. List all aliases: NONE

C. Prisoner identification number: M48627

D. Place of present confinement: Pontiac C.C.

E. Address: Po Box 99 Pontiac IL, 61764

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

A. Defendant: Thomas Dart
Title: Sheriff
Place of Employment: Cook County Jail

B. Defendant: Director Daniel Moreci
Title: Director of 9 / Sheriff
Place of Employment: Cook County Jail

C. Defendant: Director Jones
Title: Director of Cook County Mental Health
Place of Employment: Cook County Correctional

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

D. Sergeant Jones
Title: Cook County Sergeant
Place of Employment: Cook County Jail

E. Officer John Doe
Title: Sheriff
Place of Employment: Cook County Jail

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

Director Jones, Ofc. John Doe, Sgt. Jones that plaintiff would suffer physical and mental injury on that day due to their indifference to his mental illness. Due to the indifference and omissions with knowledge by defendants ~~Director Jones, Ofc. John Doe, Sgt. Jones, Dr. Moreci, Dr. Jones~~ plaintiff suffered physical injuries and emotional distress proximately caused by violations of his constitutional rights.

Court II. Jurisdiction of this court is invoked Pursuant 28 USC 133 (7). At all times relevant Thomas Dart served as sheriff of Cook County a duly elected official. At All times relevant Defendants Ofc. John Doe Sgt. Jones, Dr. Moreci, Dr. Jones acted within the scope of their employment as deputy sheriffs of Cook County, Illinois Pursuant to 745 ILCS 10/9 - 102, Defendants Thomas Dart in his official capacity as sheriff of Cook County is required to indemnify the above named defendants for any compensatory damages awarded by judgement of this court.
Defendants Thomas Dart is sued in his individual and official capacity Director Jones, Moreci, Officer John Doe Sgt. Jones, Nurse Jane Doe are sued in their individual and official capacity all personally involved one way or another through personal involvement or knowledge.

V. Statement of Claim:

State here as briefly as possible the facts of your case. Describe precisely how each defendant is involved. Include also the names of other persons involved, dates, and places.

Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

This lawsuit complaint for damages to redress acts violating plaintiff's constitutional right to be provided medical treatment and negligence while incarcerated in violation of the Constitutional rights under 42 USC A Due Process / Equal Protection. Defendants Director Daniel Moreci and Director Jones together gave clearance for me to be transferred to Div 9 Administrative Cell block where in past I have jumped from Div 9 Gallery therefore being deliberate Indifferent to serious medical need.

On I believe 10-31-14 of the 7-3 shift tier 11 Div 9 reported to John Doe Defendant that he was in need of Mental Evaluation while inside interlock area being medicated in presence of Nurse also. I further stated that I have a history of Mental Health and self harm. Officer John Doe order me to return to tier in a loud voice.

After returning to Cellblock I ingested pills and climbed stairs of gallery proceeded through railing falling to ground with serious impact unconscious.

Sgt. Jones and other Nurse ~~████████~~ came to me while I was on floor I was awoken after

Nurse grab and applied pressure to neck and back causing me great pain attempting to get me to stand.

I was left for over a hour while in pain unable to move. During that time I was able to throw up the pills inside my stomach.

Paramedics were called and I was placed on backboard by fire fighters and taken to Stroger Hospital.

At all times above mentioned Director Daniel Moreci was Director of Div 9 in Cook County Jail and was responsible for care and Medical needs of inmates.

At all times mentioned Director Jones was responsible for Mental Health inmates overseeing treatment adequate housing ect.

The actions of Defendants Dir Daniel Moreci, Dir Jones, Sgt. Jones, Ofc. John Doe in denying treatment to plaintiff while having knowledge of the fact that he was in jeopardy of injury without medical treatment constitutes deliberate indifference to his condition resulting in cruel and unusual punishment Suffering by plaintiff while he was awaiting trial and prior to adjudication of Guilt constitutes a violation of U.S. Constitution. It was foreseeable to defendants Dir. Moreci,

VI. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

Plaintiff prays for entry of a Judgment
against defendants and award of
compensatory as well as Punitive damages
cost and attorney fees.

Trial by Jury Yes No CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 22 day of Aug, 20 16

SDNes
(Signature of plaintiff or plaintiffs)

Sean Hanks
(Print name)

M48627
(I.D. Number)

Pontiac Correction Center

POBox 99

Pontiac, IL 61764

(Address)

IN THE

United States District Court

Sean Hanks

Plaintiff/Petitioner

vs.

Thomas Dart

Defendant/Respondent

No. 16 C 6890

PROOF/CERTIFICATE OF SERVICE

TO: Prisoners Correspondent
219 S. Dearborn St.
Chicago IL 60604

Assistant States Attorney
TO: 500. Richard J. Daley Center
Chicago IL, 60602

PLEASE TAKE NOTICE that at: 10 AM 25 Aug 2016
placed the documents listed below in the institutional mail at Pontiac, IL
Correctional Center, properly addressed to the parties listed above for mailing through the
United States Postal Service.

Pursuant to 28 USC 1746, 18 USC 1621 or 735 ILCS 5/1-109 I declare, under penalty of perjury
that I am a named party in the above action, that I have read the above documents, and that
the information contained therein is true and correct to the best of my knowledge and belief.

DATED: 25 Aug 2016

/s/ 
Name: Sean Hanks
IDOC No. M48627
Pontiac Correctional Ctr.
POB ox 99
Pontiac, IL